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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

EXXON MOBIL CORPORATION,

Petitioner/Plaintiff,

v.

SANTA BARBARA COUNTY
BOARD OF SUPERVISORS,

Respondent/Defendant,

and

ENVIRONMENTAL DEFENSE
CENTER, GET OIL OUT!, SANTA
BARBARA COUNTY ACTION
NETWORK, SIERRA CLUB,
SURFRIDER FOUNDATION,
CENTER FOR BIOLOGICAL
DIVERSITY, and WISHTOYO
FOUNDATION,

Proposed Defendant-
Intervenors.

Case No. 2:22-cv-03225(DMG MRWx)

**DECLARATION OF CHAD
NELSEN IN SUPPORT OF
MOTION TO INTERVENE**

Hon. Dolly Gee

Hearing: October 21, 2022

Time: 9:30 a.m.

Place: Courtroom 8C,
350 West 1st Street, Los Angeles

1 I, Chad Nelsen, declare as follows:

2 1. My name is Chad Nelsen. I am over 18 years old. I have personal
3 knowledge of the following facts and if called as a witness, would testify to these
4 facts under oath.

5 2. I currently live in Laguna Beach, California.

6 3. I am the Chief Executive Officer (“CEO”), and a current member, of
7 the Surfrider Foundation. I was appointed as CEO in 2014 after 16 years on staff
8 with the Surfrider Foundation, most recently as Environmental Director. In this
9 role, I am responsible for strategic guidance of environmental campaigns and
10 stewardship programs at the local, regional, and national level. I oversee a
11 network of over 220 chapters and clubs, 69 staff, and a number of programs that
12 include volunteer beach cleanups, water quality monitoring, ocean-friendly
13 restaurants, environmental education and outreach programs.

14 4. Surfrider Foundation is an environmental, non-profit organization
15 dedicated to the protection and enjoyment of the world’s ocean, waves, and
16 beaches for all people. Surfrider advocates preservation of and access to the coast
17 and ocean for future generations. Surfrider has over 350,000 supporters and
18 members, 79 local chapters and 144 school clubs in the United States and
19 maintains 19 chapters in California, including the Santa Barbara Chapter, as well
20 as the Isla Vista School Club.

21 5. Surfrider has long been dedicated to protecting the California
22 coastline, especially the Gaviota Coast, from the threats of oil and gas
23 development and transportation, and we remain actively committed to opposing
24 ExxonMobil’s dangerous project to transport crude oil through this sensitive
25 region. Surfrider has fought to preserve the Gaviota Coast for over 30 years,
26 protecting it from over-development and ensuring beach access for all.

27 Additionally, we have challenged oil and gas leasing expansion nationwide for
28 many years. This includes challenges to harmful offshore seismic testing, the

1 precursor to drilling, and we have actively engaged in oil spill response and
2 cleanup.

3 6. Surfrider's members derive recreational, aesthetic, and economic
4 benefits from the Pacific Ocean off the coast of California and the diverse coastal
5 and marine life that resides there, including species that are likely to be harmed
6 by oil trucking activities. They also enjoy recreation on the Gaviota Coast,
7 including surfing, swimming, beach walking, observing wildlife and habitat, and
8 other coastal recreation. Additionally, Surfrider members carry out conservation
9 activities, such as beach cleanups, regularly in Santa Barbara County. Surfrider's
10 members' future use and enjoyment of the Pacific Ocean off of California
11 depends upon healthy and sustainable coastal resources, such as clean water and
12 thriving coastal habitats. Our members interests would be severely harmed if this
13 project were allowed to go forward—as it would threaten their personal safety
14 travelling on the proposed route, harm wildlife that our members enjoy observing,
15 and adversely impact the Gaviota Coast's environmental and scenic integrity.

16 7. I have been informed and am aware of the likely adverse impacts of
17 ExxonMobil's proposed trucking project, including its increased risk of oil spills
18 and tanker truck accidents. If allowed to proceed, ExxonMobil's trucking project
19 would undermine Surfrider's decades-long advocacy protecting the Gaviota Coast
20 as a world-class recreational resource for surfers, hikers, and more. Furthermore,
21 increasing truck traffic would decrease the safety of accessing this incredible
22 region, and the increased risk of oil spills threatens to spoil its sensitive wildlife,
23 and marine and coastal environments. Protecting this region, and ensuring that it
24 is accessible to all, goes to the heart of our work.

25 8. Accordingly, Surfrider has actively participated in the campaign
26 against the ill-conceived oil trucking plan and the public process leading to denial
27 of the project. We have joined comments submitted to the Planning Commission
28

1 and Board of Supervisors, and used social media messages to call our members to
2 action to oppose the project.

3 9. Surfrider now seeks to intervene in ExxonMobil's lawsuit
4 challenging the County's denial of its trucking proposal. This effort is central to
5 Surfrider's mission, and a court order upholding Santa Barbara County's decision
6 will ensure the safety of our members and protection of the environment.

7 I declare under penalty of perjury that the foregoing is true and correct to
8 the best of my knowledge, information, and belief.

9 Executed at San Clemente, California, on August 29, 2022.

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12 **Dr. Chad Nelsen**
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